CUSTOMER NO.: 24498
Serial No.: 09/980,503
Final Office Action dated: 10/30/06
Response dated: 07/06/07

Remarks/Arguments

Claims 1, 3-6 and 10 are now pending in this application.

Reconsideration of the above-identified application in view of the following remarks, is respectfully requested.

Claims 1 and 3-6 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Gurantz (U.S. Patent No. 5,936,660) in view of Ushiyama (U.S. Patent No. 6,349,140).

Gurantz is directed to a system for decrypting and transmitting television program content to a plurality of television receivers using a single converter box (Gurantz, Abstract). The converter box of Gurantz includes a plurality of independent tuning, demodulation and video compression paths corresponding to each television receiver (Gurantz, FIG. 3). Each path shares a common conditional access unit and remote control receiver (Gurantz, column 2, lines 43-47).

Ushiyama discloses a television descrambling system comprising a "parent unit" and one or more "child units," each of which is coupled to an associated television receiver (Ushiyama, FIGS. 3-4). The parent unit receives scrambled program content from a service provider and employs a single descrambler (40) to descramble the content (Ushiyama, FIGS. 3, 5). The parent unit also comprises a microprocessor that controls the descrambler and instructs the parent unit and child unit tuners to change the channel presented on their corresponding televisions in response to channel command signals received from either the light receiving unit (remote control receiver) of the parent unit or from the child unit, respectively (Ushiyama, Column 6, lines 4-9). The microprocessor of the child unit controls the overall operations of the child unit, which mainly comprises processing signals from its corresponding remote control and sending channel command signals to the parent unit (Column 8, lines 14-25).

Gurantz and Ushiyama, either singly or in combination, fail to disclose or render obvious using a plurality of management means to drive conversions of scrambled signals through a plurality of corresponding descrambling modules, as recited in the claims.

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First, Gurantz does not describe multiple management means, as admitted by the examiner (October 30, 2006 Office Action, p. 6, paragraph 2). Second, although Gurantz discloses separate signaling paths that comprise tuner, demodulator, decompression and modulator units, Gaurantz does not disclose multiple descrambling units. Contrary to the examiner's assertions, the tuner, demodulator, decompression and modulator units of the signaling paths described in Gurantz only change the format of the signal; they do not descramble the signal. Those of ordinary skill in the art understand descrambling to mean decryption of data that is encrypted to prevent unauthorized access. The only module in the signaling path that performs the descrambling function as described in Gurantz is the conditional access unit, which is "shared" by each signaling path (Gurantz, column 2, lines 43-54). Accordingly, Gurantz does not disclose or suggest multiple management means that drive separate corresponding descrambling modules.

In addition, Ushiyama also fails to disclose a plurality of management means that drive multiple descrambling modules. Although Ushiyama discloses multiple processors associated with each parent and child unit, as stated above, the system of Ushiyama comprises only one descrambling module that is controlled by the microprocessor of the parent unit (Ushiyama, FIG. 3). Furthermore, the microprocessor of the child does not "drive" or control the descrambling module, as its primary function is to process remote control signals and to send channel command signals to the parent unit (Column 8, lines 14-25). Thus, Ushiyama does not disclose or suggest multiple management means that drive conversions of scrambled signals through multiple corresponding descrambling modules.

Furthermore, Ushiyama teaches away from coupling descrambling modules to each child unit. One of the objects of the system disclosed in Ushiyama is to "provide an information receiving system for allowing the number of subscriber terminal units controlled by a center [service provider] to be decreased, thereby reducing the load of processing performed by the center" (Ushiyama, column 2, lines 1-5). The system of Ushiyama decreases the number of terminal units by allowing "only the parent" unit to have "the descrambling function" (Ushiyama, column 11, line 65 to column 12, line 10).

Thus, Gurantz and Ushiyama, either singly or in combination, fail to disclose or render obvious at least the feature of employing at least two management means for driving conversions of scrambled signals through at least two respective descrambling modules.

The present principles, however, include the feature of employing a plurality of management means (10, 20) for driving conversions of scrambled signals through multiple corresponding descrambling modules (16, 26) (Specification, FIG. 2). The system of the present principles allows the user to receive content from multiple and different sources (Specification, p. 8, lines 17-24; E1, E2, FIG. 2). This benefit is facilitated by employing a plurality of management means to drive their respective descrambling modules and to descramble content from a plurality of sources (Specification, p. 10, lines 24-30) (U1, CW1 and V1, CW2, FIG. 3). Each management means and associated descrambling module may independently process different access control messages corresponding to content from different sources (Specification, p. 10, lines 24-30) (U1, CW1 and V1, CW2, FIG. 3). Gurantz and Ushiyama do not disclose or remotely suggest descrambling and presenting content from multiple and different sources. The conversion units described in Gurantz and Ushiyama only descramble content from one source using one descrambler.

As discussed above, Gurantz and Ushiyama, taken singly or in combination, fail to disclose or render obvious at least the feature of using multiple management means for driving conversions of scrambled signals through multiple descrambling modules. Thus, the present principles are patentably distinguished from Gurantz and Ushiyama, taken singly or in any combination.

It should also be noted that Gurantz and Ushiyama may not be combined to make the present principles prima facie obvious. "If the proposed modification or combination of the prior art would change the principle of operation of the prior art invention being modified, then the teachings of the references are not sufficient to render the claims *prima facie* obvious." MPEP §2143.01 (citing *In re Ratti*, 270 F.2d 810, 123 USPQ 349 (CCPA 1959)). A goal of Gurantz is to provide converted signals to a plurality of television receivers by employing a single converter box (Gurantz, column 3, lines 50-66). Ushiyama discloses coupling several external child units to a parent unit. Adding child units to the conversion box of Gurantz would

change the principle of operation of the system described in Gurantz, as Gurantz would no longer comprise a single converter box. Thus, the combination of Gurantz and Ushiyama does not render the present principles prima facie obvious.

Claim 1 includes, inter alia: a "[p]ay-per-use communication device, in particular for television pictures, comprising: . . . first and second processing pathways comprising respective first and second management means for driving the conversions of the first and second scrambled signals via selected ones of the first and second descrambling modules. . . ." As discussed above, Gurantz and Ushiyama, taken singly or in combination, do not disclose or render obvious the feature of employing multiple management means for driving conversions of scrambled signals through multiple descrambling modules.

Thus, claim 1 is patentable over Gurantz and Ushiyama, taken singly or in combination for at least the reasons stated above. Moreover, claims 3-6 are also patentable over Gurantz and Ushiyama due at least to their dependencies on claim 1.

Claim 10 stands rejected under 35 U.S.C. §102(e) as being unpatentable over Gurantz.

Claim 10 includes, inter alia: "a demultiplexer device, said demultiplexer device having a demultiplexer control input and a demultiplexer device input, said demultiplexer device input being operatively coupled to said demodulator device output, said demultiplexer device including a plurality of descrambler devices, said plurality of descrambler devices having a respective plurality of descrambler device outputs." As discussed above, Gurantz fails to disclose or render obvious using a plurality of descrambling modules because decryption is performed by only the conditional access unit, which is shared by all tuning, demodulation and video compression paths. Thus, claim 10 is patentably distinguished from Gurantz for at least the reasons stated above.

In view of the foregoing, Applicant respectfully requests that the rejections of the claims set forth in the Office Action of October 30, 2006 be withdrawn, that pending claims 1, 3-6 and 10 be allowed, and that the case proceed to early issuance of Letters Patent in due course.

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As stated in the first paragraph of this Amendment, please charge any and all fees that are currently due to Deposit Account No. 07-0832.

Respectfully submitted,

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